

TO: The Federal Communications Commission, Commission Members:
Kathleen Abernathy, Jonathan Adelstein, Michael Copps, Kevin Martin, Michael Powell.

FROM: Jeremy Gill, Seattle, WA

SUBJECT: Written Comments on Proposed Changes to Media Ownership Rules.

DATED and sent via electronic submittal: MAY 13 2002

Commission Members:

Regarding the matters relating to your consideration of the possibility of modifying the current language of the following FCC rules:

(1) Broadcast-Newspaper Cross-Ownership Prohibition (1975) - Bans ownership of both a newspaper and a television station in the same market.

(2) National Television Ownership Rule (1941) - A broadcaster cannot own television stations that reach more than 35% of the nation's homes.

(3) Dual Network Rule (1946) - No entity can own more than one major television network.

(4) Local Television Ownership Rule (1964) - A broadcaster can't own more than one of the top four stations in a single market.

(5) Local Radio Ownership Rule (1941) - Limits the number of radio stations any one entity can own in a single market.

(6) Television-Radio Cross-Ownership Rule (1970) - Limits the number of TV and radio stations a single entity can own in any given market.

I do not believe that "the public interest" is AT ALL served by the modification of the language of ANY of the FCC rules cited above.

Despite Chairman Michael Powell's smug and self-aggrandizing rhetoric which scoffs at the concept of "the public interest" as if it is merely an illusory concept which has failed to visit "his majesty" in a dream on the night of his coronation, you all as Commissioners of the FCC are, in fact, sworn to consider and uphold "the public interest", despite the pugnacious and intentionally oversimplified crusades of your young, hot-headed, and egotistical Chairman. The FCC is charged with considering all empirical evidence, not limited to the slick and falsely assuring studies which have been commissioned by the FCC alone.

In example, see the following study results found at the Journalism.org web page: <http://journalism.org/resources/research/reports/ownership/default.asp>

<< For five years, the Project for Excellence in Journalism has conducted the largest examination ever undertaken of local television news in the United States to deconstruct what local TV news offers citizens and examine what kind of content viewers preferred.

The findings-an analysis of 172 distinct news programs, some 23,000 stories, over five years-suggest that ownership type did make a difference.

Among the findings:

Smaller station groups overall tended to produce higher quality newscasts than stations owned by larger companies-by a significant margin.
Network affiliated stations tended to produce higher quality newscasts than network owned and operated stations-also by a large margin.

The data show stations owned by big companies were capable of high quality. However, for reasons that are impossible to determine from the numbers, these stations didn't tend to produce high quality when most viewers were watching.

Taken together, the findings suggest the question of media ownership is more complex than some advocates on both sides of the deregulatory debate imagine.

... overall the data strongly suggest regulatory changes that encourage heavy concentration of ownership in local television by a few large corporations will erode the quality of news Americans receive. >>

Something is really "rotten in Denmark" at the FCC. These proposed rule changes have been rammed through the process by Chairman Powell in the most specious and arrogant manner. When asked in a CNN poll the other day whether they believe that media ownership in the United States is, at the present time, too concentrated, 98% responded that YES, it is. Yet, the populace is told that the FCC may likely vote 3 to 2 to worsen and degrade the present situation further. The FCC is sworn to listen to that public, not to slide fastballs by that public in the interest of corporate profits only. Such support of the interests of corporations, while intentionally ignoring the public interest, reeks of (at worst) outright corruption, and (at best) supreme pin-headedness at the expense of the "public interest" of our nation.

Would you like to be remembered as a public servant of conscience, or a sycophant for corporate cowboys in a slash and burn policy change guaranteed to leave the "public interest" little more than scorched earth?

I strongly urge you to ignore your egotistical Chairman, and do the right thing! Do not modify any of the language of ANY of the FCC rules cited above.